

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BRANDON SMIETANA and SKYCOIN
GLOBAL FOUNDATION LIMITED, a
Singapore company, and SYMBOLIC
ANALYTICS INC. a Delaware Corporation

Plaintiffs,

v.

BRADFORD STEPHENS, AARON
KUNSTMAN, HARRISON GEVIRTZ, f/k/a
“HaRRo”, RYAN EAGLE, ANDREW YOUNG,
FAR AHEAD MARKETING, JOEL WAYNE
CUTHRIELL f/k/a “JOEL”, MORGAN PECK,
TRISTAN GREENE, BRYAN CLARK,
CATHERINE BYERLY, STEVEN LEONARD,
JOSH OGLE, and UNKNOWN INDIVIDUALS
AND COMPANIES

Defendants.

Case No.: 1:22-cv-00708

**DEFENDANT FAR AHEAD MARKETING,
LLC’S RENEWED NOTICE OF MOTION
AND MOTION TO DISMISS UNDER
FEDERAL RULE OF CIVIL PROCEDURE
12(b)(2) FOR LACK OF PERSONAL
JURISDICTION**

Presentment Date: October 26, 2022
Time: 9:30 a.m.
Location: 1403

Hon. Sara L. Ellis

**NO ORAL ARGUMENT UNLESS
REQUESTED BY THE COURT**

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT Defendant Far Ahead Marketing, LLC will and hereby does move this Court for an order dismissing all Counts against it under Federal Rule of Civil Procedure 12(b)(2) for lack of personal jurisdiction. Through its renewed motion, Far Ahead Marketing, LLC requests to be completely dismissed from this case. This renewed motion is made under the Federal Rules of Civil Procedure 12(b)(2) and is based on this Notice of Motion and Renewed Motion, the Memorandum of Points and Authorities in support thereof, the Declaration of Joshua Ogle (previously filed as ECF 15-2 and 15-3 and resubmitted with this renewed motion) and attached exhibits, all pleadings and papers on file in this action, and upon such other matters as may be presented to the Court at the time of the hearing should the Court order oral argument.

PLEASE TAKE NOTICE THAT on October 26, 2022 at 9:30 a.m. or as soon thereafter as Far Ahead Marketing, LLC may be heard, it will appear through its Counsel of Record that is specially appearing on its behalf to present the above referenced motion, before the Honorable Judge Sara L. Ellis of the U.S. District Court of the Northern District of Illinois, Eastern Division, 219 South Dearborn St., Chicago, Illinois to present the above referenced Motion.

Dated: October 18, 2022

MORELLO LAW, P.C.

By: /s/ Justin A. Morello

JUSTIN A. MORELLO (CA SB# 239250)

Attorneys Specially Appearing for Defendant
Far Ahead Marketing, LLC (Appearing *Pro*
Hac Vice)